

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 16cr265 (LMB)
)	
)	
NICHOLAS YOUNG,)	
)	
Defendant.)	
)	

DEFENDANT NICHOLAS YOUNG’S MOTION FOR DISCLOSURE OF FISA-RELATED MATERIAL AND/OR TO SUPPRESS THE FRUITS OR DERIVATIVES OF ELECTRONIC SURVEILLANCE AND PHYSICAL SEARCH PURSUANT TO FISA

Defendant Nicholas Young, by and through his undersigned counsel, moves the Court for disclosure of certain materials filed by the government to obtain information collected through electronic surveillance and physical search pursuant to the Foreign Intelligence Surveillance Act of 1978 (FISA), as amended, 50 U.S.C. §§ 1801-1812 and 1821-1829 (the fruits and derivatives collectively, “FISA Evidence”). Alternatively, Mr. Young moves to suppress the FISA Evidence following the Court’s *in camera* and *ex parte* review of that information. Mr. Young’s arguments are supplied in the accompanying memorandum.

Dated: January 31, 2017

Respectfully submitted,

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Certificate of Service

I hereby certify that on the 31st day of January, 2017, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following CM/ECF user(s):

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And I hereby certify that I have mailed the document by United States mail, first class postage prepaid, to the following non-CM/ECF participant(s), addressed as follows: [none].

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